

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK DANIELS, RASHID RAHMAN, FELIPE	:
RIVERA-CRUZ and TERRY MATHIS on behalf of	:
themselves and others similarly situated	:
	:
Plaintiffs,	:
	:
- against -	:
	:
DR. CAROL MOORES	:
	:
Defendant.	X

19-CV-8173(LAP)

**PLAINTIFFS' AMENDED
PROPOSED PRETRIAL ORDER**

Pursuant to this Court's Order, Plaintiffs propose the following Pretrial Order:

i. CAPTION

The proposed caption of this case for trial will be *Mark Daniels, Rashid Rahman, Felipe Rivera-Cruz, and Terry Mathis, on behalf of themselves and others similarly situated vs. Dr. Carol Moores*, 19-cv-8173(LAP) as set forth above.

ii. THE AMOUNT OF TRIAL TIME FOR PLAINTIFFS' CASE IN CHIEF

Pursuant to the Court's order Plaintiffs have fifteen courtroom hours to present their case-in-chief as well as rebuttal.

iii. TRIAL COUNSEL

For Plaintiff

Amy Jane Agnew, 973.600.1724
Joshua Morrison, 312.206.8185
Law Office of Amy Jane Agnew, P.C.
24 Fifth Avenue, Suite 1701
New York, New York
aj@ajagnew.com
josh@ajagnew.com

iv. JURISDICTION

This Court has subject matter jurisdiction under 28 U.S.C §§ 1331 and 1343. Plaintiffs bring this action pursuant to 42 U.S.C. § 1983 for violation of their rights secured by the Eighth Amendment to the United States Constitution. The jurisdiction of this Court is not disputed.

v. SUMMARY OF CLAIMS AND DEFENSES

Plaintiff's Claims:

a. Plaintiff's claims to be tried:

This is a 42 U.S.C § 1983 case in which the Plaintiff class alleges that there are on-going practice of constitutional violations related to the treatment of patients suffering from chronic pain in DOCCS facilities.

Defendants' Defense:

Defendant Moores denies this claim.

vi. NO TRIAL BY JURY

As this is a class action suit for injunctive and declaratory relief, no jury will be empaneled. The estimated length of trial will be 30 hours.

vii. TRIAL BY MAGISTRATE JUDGE

One or both of the parties refused consent to trial by a magistrate judge.

viii. STIPULATIONS

There are currently no stipulations. Plaintiffs are more than happy to stipulate that:

1) All patient witnesses and class members are prisoners currently in the custody of the New York State Department of Corrections and Community Supervision ("DOCCS").

2) Dr. Carol Moores currently serves as the Chief Medical Officer of DOCCS and has the ability to recommend and implement medical policy and enforce medical policy and court orders related to same.

3) Except for housing and security level, all class members and prisoner witnesses are “similarly situated” for purposes of the instant litigation as they all suffer from chronic pain.

ix. LIST OF WITNESSES IN CASE IN CHIEF:

a. Plaintiff’s Witness List

1. Dr. Adam Carinci. Dr. Carinci will testify as to the contents of his expert report, including his physical examination of seventeen class members and his conclusions regarding the impact of the MWAP Policy on patient health.

2. Dr. Michael Salvana. Dr. Salvana will testify about his efforts, along with several colleagues, to have the Walsh RMU exempted from the MWAP Policy due to the negative impact on patient health and treatment. He will testify that despite his robust efforts, his concerns were ignored by the Chief Medical Officer and several Regional Medical Directors. Dr. Salvana will testify to the impact on patient care and to his constructive termination for vocally opposing the MWAP Policy.

3. Dr. John Morley. Dr. Morley will testify to his efforts to reassess patients in light of this litigation, as well as to rescind and replace the MWAP Policy with 1.24A. Dr. Morley will testify that providers were not trained to implement 1.24A despite the fact that he and other Central Office staff received inquiries. He will also testify to DOCCS’ ability to mobilize resources to address issues within the health services division, including to address the COVID 19 pandemic and the implementation of DOCCS’ Medication Assisted Treatment program both of which involved identifying patients, training staff and ensuring the assessment and treatment of patients for both programs.

4. Dr. Carl Koenigsmann. Dr. Koenigsmann will testify that the MWAP Policy went beyond the restrictions established by law and in the wider medical community and that there was no real data culled or consulted in order to formulate it. Dr. Koenigsmann will testify that the RMDs insisted that MWAP function as a “policy” and not a guideline and that there were occasions when providers went around the RMDs to have him personally approve MWAP medications. Dr. Koenigsmann will testify as to his own actions in response to this Court’s imposition of contempt sanctions in *Medina II*.

5. David Dinello. Dinello will testify to being the architect of the MWAP Policy and confirm that when asked under oath why the hundreds of class members in this suit would sue if they were so happy to lose their medication, he replied, “but did they die?” Dinello will also testify to not having bothered reading this Court’s contempt decision in *Medina II* and making no efforts to revisit the MWAP Policy in light of same. Dinello will also testify that MWAP was a “great success” and reaped the intended results.

6. Dr. Susan Mueller. Susan Mueller will testify to her knowledge regarding the Narcotics Review Committee, Project Neurontin, the implementation of the MWAP Policy, the

number of patients whose medications she discontinued both before and during MWAP, her issues with providers during the MWAP regime and the consequences to patient care.

7. Dr. John Hammer. John Hammer will testify to his knowledge regarding the implementation of the MWAP Policy, the number of patients whose medications he discontinued both before and during MWAP, his issues with providers during the MWAP regime and the consequences to patient care.

8. Dr. Carol Moores. Dr. Moores will testify to her knowledge of the MWAP Policy, that 80% of the providers she spoke with did not support the policy, the promulgation of Policy 1.24A, the implementation of 1.24A, the reassessment process and the steps she has taken to implement 1.24A and implement the Court's preliminary injunction order.

9. Ronald Alston. Mr. Alston will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Alston will also testify about avenues to care, including how the sick call system operates in his current facility.

10. Anthony Jackson. Mr. Jackson will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Jackson will also testify about avenues to care, including how the sick call system operates in his current facility.

11. Terry Mathis. Mr. Mathis will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Mathis will also testify about avenues to care, including how the sick call system operates in his current facility.

12. Anthony Griggs. Mr. Griggs will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Griggs will also testify about avenues to care, including how the sick call system operates in his current facility.

13. Ramal Myriee. Mr. Myriee will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Myriee will also testify about avenues to care, including how the sick call system operates in his current facility.

14. Mark Daniels. Mr. Daniels will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Mathis will also testify about avenues to care, including how the sick call system operates in his current facility. Mr. Mathis will also testify about the recent reinstatement of his effective treatment and how it was summarily discontinued upon his transfer to Woodbourne Correctional Facility.

15. Richard Vasquez. Mr. Vasquez will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Vasquez will also testify about avenues to care, including how the sick call system operates in his current facility.

16. Rafael Montanez. Mr. Montanez will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Montanez will also testify about avenues to care, including how the sick call system operates in his current facility.

17. James Pine, Sr. Mr. Pine will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Pine will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

18. John Crosby. Mr. Crosby will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Crosby will also testify about avenues to care, including how the sick call system operates in his current facility.

19. Thomas Curry. Mr. Curry will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Curry will also testify about avenues to care, including how the sick call system operates in his current facility.

20. Eric Lindemann. Mr. Lindemann will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Lindemann will also testify about avenues to care, including how the sick call system operates in his current facility.

21. Tina Vivenzio. Ms. Vivenzio will testify to her chronic pain, her medical treatment under the MWAP Policy regime and her treatment since the MWAP Policy was rescinded and 1.24A was implemented. Ms. Vivenzio will also testify about avenues to care, including how the sick call system operates in her current facility.

22. Joyce Powell. Ms. Powell will testify to her chronic pain, her medical treatment under the MWAP Policy regime and her treatment since the MWAP Policy was rescinded and 1.24A was implemented. Ms. Powell will also testify about avenues to care, including how the sick call system operates in her current facility and that even though her MWAP treatment was recently restored, her provider refuses to increase the dosage to therapeutic levels.

23. Marc Confessore. Mr. Confessore will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Confessore will also testify about avenues to care, including how the sick call system operates in his current facility.

24. Alan Sherry. Mr. Sherry will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Sherry will also testify about avenues to care, including how the sick call system operates in his current facility.

25. Matthew Herbert. Mr. Herbert will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Herbert will also testify about avenues to care, including how the sick call system operates in his current facility.

26. Miguel Tirado. Mr. Tirado will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Tirado will also testify about avenues to care, including how the sick call system operates in his current facility.

27. Thomas Briel. Mr. Briel will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Briel will also testify about avenues to care, including how the sick call system operates in his current facility.

28. John Hinespeter. Mr. Hinespeter will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Hinespeter will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

29. Robert Oleman. Mr. Oleman will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Oleman will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

30. Wayne Stewart. Mr. Stewart will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Stewart will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

31. Samson Burch. Mr. Burch will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Burch will also testify about avenues to care, including how the sick call system operates in his current facility.

32. Kenneth Windley. Mr. Windley will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was

rescinded and 1.24A was implemented. Mr. Windley will also testify about avenues to care, including how the sick call system operates in his current facility.

33. Sydney Melendez. Ms. Melendez will testify regarding her efforts to schedule law student interviews with patient/witnesses in the early summer of 2023, including the dates of those visits and with whom the law students met.

x. DEPOSITION TESTIMONY DESIGNATION

Plaintiffs would respectfully request that the testimony of the following witnesses be submitted via deposition transcript or videotaped version of same: David Dinello, John Morley, Carl Koenigsmann, John Hammer, and Susan Mueller.

xi. EXHIBITS TO BE OFFERED IN CASE IN CHIEF

a. Plaintiff's Exhibit List for Case in Chief.

EX.	Description (Basis for Admissibility)	Bates Range
1	HSP 1.24, "Medications with Abuse Potential"	
2	DOCCS' Health Services Policy Manual	MWAP 000348 – MWAP 000747
3	Medical Records, Wayne Stewart (Fed. R. Evid. 803 (3), (4), (6).)	WS 000001 – 002986; OAG WS 000001 – 000426; OAG MWAP 23135 – 23175, 30588 – 30604, 60501, 60662, 66394 – 66419, 73381 – 63411, 84930 – 85031, 95383 – 95501
4	Medical Records, Kenneth Windley (Fed. R. Evid. 803 (3), (4), (6).)	WINDLEY DEF 000001 – 925; MOORES 13945 – 13972
5	Medical Records, Robert Oleman (Fed. R. Evid. 803 (3), (4), (6).)	RO 000001 – RO 000715; OLEMAN 000001 002097; FHS1 REFERRAL SUMMARY 000550; OLEMAN DEF 000001 – OLEMAN DEF 000012; MOORES 007592; OAG MWAP 080030 – OAG MWAP 080060; FHS1 REFERRAL SUMMARY 000233 – 000244
6	Medical Records, John Hinespeter (Fed. R. Evid. 803 (3), (4), (6).)	HINESPETER 000001 – 001603; HINESPETER DEF 000001 – HINESPETER 000335; MOORES 7792 – 7801; MOORES 11032 - 11042

7	Medical Records, Thomas Briel (Fed. R. Evid. 803 (3), (4), (6).)	BRIEL DEF 000001 – BRIEL DEF 000173; MOORES 10733 - 10744
8	Medical Records, Miguel Tirado (Fed. R. Evid. 803 (3), (4), (6).)	TIRADO 000001 – TIRADO 000132; MOORES 12573 - 12698
9	Medical Records, Alan Sherry (Fed. R. Evid. 803 (3), (4), (6).)	SHERRY 000001 – SHERRY 000476; MOORES 12524 - 12572
10	Medical Records, Marc Confessore (Fed. R. Evid. 803 (3), (4), (6).)	CONFESSORE 000001 – CONFESSORE 000591; CONFESSORE DEF 000001 – CONFESSORE 000627; MOORES 10757 - 10790
11	Medical Records, Eric Lindemann (Fed. R. Evid. 803 (3), (4), (6).)	LINDEMANN DEF 000001 – LINDEMANN DEF 000146; MOORES 11043 - 11047
12	Medical Records, Thomas Curry (Fed. R. Evid. 803 (3), (4), (6).)	CURRY 000001 – CURRY 000114; CURRY DEF 000001 – CURRY DEF 000123; MOORES 10878 – 10880
13	Medical Records, John Crosby (Fed. R. Evid. 803 (3), (4), (6).)	CROSBY 000001 – CROSBY 001432; CROSBY DEF 000001 – CROSBY DEF 001451; MOORES 10791 - 10877
14	Medical Records, James Pine, Sr. (Fed. R. Evid. 803 (3), (4), (6).)	PINE 000001 – PINE 000194; PINE DEF 000001 – PINE DEF 000183; MOORES 11281 - 11315
15	Medical Records, Rafael Montanez (Fed. R. Evid. 803 (3), (4), (6).)	MONTANEZ DEF 000001 – MONTANEZ DEF 000707; MOORES 11171 - 11198
16	Medical Records, Richard Vasquez (Fed. R. Evid. 803 (3), (4), (6).)	OAG MWAP 081378 – 081390; Defs Email 0014024; OAG RV 000001 – 000383; R VASQUEZ T&M 1-5; OAG MWAP 060674; OAG MWAP 024430 – 39; OAG MWAP 005040 – 5042; OAG MWAP 003909 – 003910; RV 000001 – RV 000440; MOORES 12699 - 12721

17	Medical Records, Mark Daniels (Fed. R. Evid. 803 (3), (4), (6).)	MD 000001 – MD 001174; MDANIELS DEF 000001 – 000069; MOORES 451 – 552; MOORES 007594 – MOORES 007616; OAG MD 000001 - 001031; OAG MWAP 011343 – 011581; OAG MWAP 029758 – 029777; OAG MWAP 0053766 – OAG MWAP 0053768; OAG MWAP 066960 – OAG MWAP 067003; OAG MWAP 073177 – OAG MWAP 073181; OAG MWAP 084632 – O84636; OAG MWAP 095937 – OAG MWAP 095943; OAG MWAP 097922 – OAG MWAP 097938; OAG MWAP 098963 – OAG MWAP 098985; MOORES 10881 - 10890
18	Medical Records, Ramal Myriee (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 7715 – MOORES 7730; MOORES 7816 – MOORES 7818; MYRIEE 000001 – MYRIEE 000233; MYRIEE DEF 000001 – MYRIEE DEF 000185; MOORES 11199 - 11280
19	Medical Records, Anthony Griggs (Fed. R. Evid. 803 (3), (4), (6).)	GRIGGS 000001 – GRIGGS 000102; MOORES 10891 - 11025
20	Medical Records, Terry Mathis (Fed. R. Evid. 803 (3), (4), (6).)	OAG TM 000001 – 002706; OAG MWAP 081522 – 081531; MOORES 2181 – MOORES 2518; OAG MWAP 017182 – O17429; OAG MWAP 029921 – OAG MWAP 029957; OAG MWAP 060502; OAG MWAP 060531; OAG MWAP 060532; OAG MWAP 060580; MWAP OAG 060663; OAG MWAP 060804; OAG MWAP 061224; OAG MWAP 061256; OAG MWAP 061270; OAG MWAP 065764; OAG MWAP 073249; OAG MWAP 084776; OAG MWAP 085032; OAG MWAP 098237 – 098339; TM 000001 001062; MOORES 11048 - 11170

21	Medical Records, Anthony Jackson (Fed. R. Evid. 803 (3), (4), (6).)	A JACKSON DEF 000001 – A JACKSON DEF 000062; AJ 000001 – AJ 000073; OAG WAP 3778 – 3779; OAG MWAP 081545 – OAG MWAP 081553; OAG A JACKSON 000001 – OAG A JACKSON 000071; OAG MWAP 004742; OAG MWAP 004746; OAG MWAP 004750 – 52; OAG MWAP 005015; OAG MWAP 005425 – OAG MWAP 005427; OAG MWAP 007824; OAG MWAP 015481 – 15549; OAG MWAP 038709 – OAG MWAP 038723; OAG MWAP 038724 – OAG MWAP 38791; OAG MWAP 054872; OAG MWAP 055256; OAG MWAP 060519; OAG MWAP 060700; OAG MWAP 061208; OAG MWAP 061424; OAG MWAP 067365; OAG MWAP 068618; OAG MWAP 083068; OAG MWAP 096256 – OAG MWAP 096263; OAG MWAP 097404 – OAG MWAP 097407
22	Medical Records, Ronald Alston (Fed. R. Evid. 803 (3), (4), (6).)	RALSTON 000001 – RALSTON 000461; RALSTON DEF 000001 – RALSTON DEF 000146; OAG MWAP 096154 – OAG MWAP 096255; OAG MWAP 064547; OAG MWAP 030804 – OAG MWAP 032359; OAG MWAP 03084 – OAG MWAP 032359; OAG MWAP 010005 – OAG MWAP 010159; OAG MWAP 009947 – OAG MWAP 010004; OAG MWAP 009876 – OAG MWAP 009946; OAG MWAP 006146 – OAG MWAP 006158; OAG MWAP 079547 – OAG MWAP 079560; MOORES 10476 - 10733
23	Medical Record Exhibits to the Report of Dr. Adam Carinci (Fed. R. Evid. 803 (3), (4), (6).)	Exhibits 2 – 69
24	MWAP Request Forms (Fed. R. Evid. 803 (3), (4), (6).)	See Attached Schedule 1
23	DOCCS' FORMULARY	MWAP 000455 – MWAP 000527
24	DOCCS' PAIN ASSESSMENT FORM Patient AT (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10394 APA - MOORES 10399 APA

25	DOCCS' PAIN ASSESSMENT FORM Patient CS (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10400 APA -MOORES 10405 APA
26	DOCCS' PAIN ASSESSMENT FORM Patient NM (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10406 APA - MOORES 10411 APA
27	DOCCS' PAIN ASSESSMENT FORM Patient EC (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10412 APA -MOORES 10413 APA
28	DOCCS' PAIN ASSESSMENT FORM Patient WG (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10414 APA -MOORES 10419 APA
29	DOCCS' PAIN ASSESSMENT FORM Patient NM (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10420 APA - MOORES 10421 APA
30	DOCCS' PAIN ASSESSMENT FORM Patient RW (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10422 APA - MOORES 10429 APA
31	DOCCS' PAIN ASSESSMENT FORM Patient MS (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10430 APA -MOORES 10431 APA
32	DOCCS' PAIN ASSESSMENT FORM Patient WR (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10432 APA
33	DOCCS' PAIN ASSESSMENT FORM Patient – Torres, Michael (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10433 APA - MOORES 10438 APA
34	DOCCS' PAIN ASSESSMENT FORM Patient ALP (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10439 APA -MOORES 10445 APA
35	DOCCS' PAIN ASSESSMENT FORM Patient BR (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10446 APA - MOORES 10451 APA
36	DOCCS' PAIN ASSESSMENT FORM Patient GJ (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10452 APA -MOORES 10457 APA

37	DOCCS' PAIN ASSESSMENT FORM Patient GH (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10458 APA -MOORES 10469 APA
38	Medical Records, Tina Vivenzio (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 12722 – 13844
39	Medical Records Joyce Powell (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 11316 – 12523
40	Medical Records Matthew Herbert (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 11026 – 11031
41	Medical Records Samson Burch (Fed. R. Evid. 803 (3), (4), (6).)	MOORES 10745 – 10756
42	SURN Reports and Chronic Pain Assessment Tools	MOORES 10092 – 10392

xii. RELIEF SOUGHT

Plaintiffs request permanent injunctive relief in the form already ordered by the Court in the Preliminary Injunction Ordered June 12, 2023. (Dkt. No. 602.)

Dated: August 22, 2023
Potsdam, New York

LAW OFFICE OF AMY JANE AGNEW, P.C.

/s/ AJ Agnew
Joshua L. Morrison
Amy Jane Agnew
24 Fifth Avenue, Suite 1701
New York, NY 10011
Counsel for Plaintiff Class

Hon. Loretta A. Preska, U.S.D.J.

Dated: August ____, 2023
New York, New York

SCHEDULE 1 to PLAINTIFF'S PTO

MWAP REQUEST FORM EXHIBITS

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